

Federal Communications Commission
Washington, D.C.

Ref: RM-10352

Dear Commissioners:

The 160 meter amateur band is quite different from all others in which the amateur service have allocation privileges for two reasons in particular:

1. It is the only medium wave amateur band and it has very unique propagation conditions.

2. It is the only amateur band that is not mode segmented. This evolved from earlier times when band operations were understood by operators who were involved with the emergence of operating privileges. This is why it has became known as the “Gentlemen’s Band”

With the proliferation of new operators and modes, including digital operations, there have been incidents where the voluntary band plan has not been complied with and interference between modes has occurred.

New narrow band operations in the future should be protected so that as they evolve, there will be a plan in place to encourage and support their development and activities without some of the problems that have surfaced since digital modes have appeared on the band.

It has become clear that mode segmentation is now necessary in order to reduce these problems and lessen the need for FCC intervention in interference issues which appear to be on the increase.

The most appropriate plan appears to be, and I fully support, the recommendations set forth in RN to restrict wideband emissions from 1.843 to 2.000 MHz. Narrow band modes such as digital and cw operations should have exclusive allocations from 1.800 to 1.843 MHz.

This is important since the weak signal conditions, especially with intercontinental contacts and propagation studies, are particularly susceptible to interference by nearby wideband mode operations.

FCC Regulation Part 97.307 (f) should be changed to clearly state this band plan since voluntary compliance cannot be depended on by all amateurs operating on the 160 meter band.

Thank you for your consideration.

Respectfully submitted,

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